

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

<b>In re: John D. Cook,</b>	<b>:</b>	<b>Chapter 13</b>
<b>Debtor</b>	<b>:</b>	
	<b>:</b>	
<b>Capital One Auto Finance, A</b>	<b>:</b>	
<b>Division of Capital One, N.A.</b>	<b>:</b>	<b>Case No. 18-02392 RNO</b>
<b>Movant</b>	<b>:</b>	
	<b>:</b>	<b>11 U.S.C. Section 362 and 1301(c)</b>
<b>Vs.</b>	<b>:</b>	
	<b>:</b>	
<b>John D. Cook,</b>	<b>:</b>	
<b>Debtor</b>	<b>:</b>	
	<b>:</b>	
<b>Charles J. DeHart, III, Esq.</b>	<b>:</b>	
<b>Trustee</b>	<b>:</b>	

**ANSWER OF DEBTOR TO MOTION FOR RELIEF  
FROM THE AUTOMATIC STAY**

AND NOW comes your Debtor, John D. Cook, by and through his counsel, Aaron J. Neuharth, Esquire and Answers Movant's Motion For Relief From Automatic Stay as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted. By way of further answer, Debtor desires to bring said payments current. Further, Debtor sent to Movant his personal check written to Movant in the amount of \$950.00, thereby reducing the arrears
8. Neither admitted or denied. Debtor is without sufficient knowledge as to the actual value of the collateral. Proof thereof is demanded at trial.
9. Admitted.
10. Admitted.
11. Neither admitted or denied. Debtor is without sufficient knowledge as to the actual value of the collateral. Proof thereof is demanded at trial.
12. Neither admitted or denied. Debtor is without sufficient knowledge as to the actual value of the collateral. Proof thereof is demanded at trial.

Wherefore, Respondent respectfully requests this Honorable Court deny Movant's Motion. Debtor desires to bring said payments current and maintain ongoing payments.

Date: December 9, 2019

/s/ Aaron J. Neuharth  
Aaron J. Neuharth  
Attorney for Debtor  
Supreme Ct. No.: 88625  
PO Box 359  
Chambersburg, PA 17201  
(717)264-2939